

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	Crim. No. 15-cr-10271-WGY
)	
ALEX LEVIN)	
_____)	

DEFENDANT'S MOTION FOR CONTINUANCE

The defendant, Alex Levin, moves that this Court grant a continuance of the trial from January 14, 2019 to any date in May. As grounds for this motion, lead counsel for the defendant has been ordered to appear in Middlesex Superior Court to begin a first degree murder trial on January 7, 2019. The trial is expected to last seven weeks, and the Court has issued a Protective Order mandating that counsel appear on that date. See Exhibit 1, Protective Order.

The case at bar is scheduled for trial on January 14, 2019. Attorney J. W. Carney, Jr. is lead counsel for the defendant. The trial of *Commonwealth v. Pallavi Macharla*, Docket No. 1581-CR-128, was scheduled to begin in Middlesex Superior Court on October 22, 2018. However, the trial was continued on that date due to the unavailability of a Telugu interpreter, who is needed for the trial's entirety. The defendant in *Macharla* is charged with the death of a six-month-old child who was in her care on March 27, 2014. She was indicted one year later on March 4,

2015. The trial is now scheduled to begin on January 7, 2019. The Superior Court has indicated that it will not continue the case further, and has obtained a Telugu interpreter for that date.

WHEREFORE, the defendant moves that this Court continue the trial date from January 14 until any date in May. Counsel has two trials in February (in the Superior Court) which must be rescheduled, two trials in March (in the Superior Court and this Court), and a ten co-defendant trial scheduled in April.

ALEX LEVIN
By his attorneys,

CARNEY & ASSOCIATES

J. W. Carney, Jr.

J. W. Carney, Jr.
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October 26, 2018

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

J. W. Carney, Jr.

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AFFIDAVIT SUPPORTING
DEFENDANT'S MOTION FOR CONTINUANCE

I, J. W. Carney, Jr., state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

J. W. Carney, Jr.
J. W. Carney, Jr.

October 26, 2018